

BOEHM, KURTZ & LOWRY

ATTORNEYS AT LAW
36 EAST SEVENTH STREET
SUITE 1510
CINCINNATI, OHIO 45202
TELEPHONE (513) 421-2255
TELECOPIER (513) 421-2764

VIA E-FILING

August 29, 2017

Talina Mathews, Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40602

Re: Case No. 2017-00179

Dear Ms. Mathews:

Please find enclosed the original and six (6) copies of the MOTION TO COMPEL DISCOVERY RESPONSES OF KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC. e-filed today in the above-referenced matter. In accordance with 807 KAR 5:001 Section 8(7), KIUC certifies that (a) the electronic version of this filing is a true and accurate copy of each paper filed in paper medium; (b) the electronic version of this filing has been submitted to the Commission; and (c) a copy of this filing in paper medium has been mailed to all parties that the Commission has excused from electronic filing procedures. No materials are being filed in paper that are not included in the electronic submission.

By copy of this letter, all parties listed on the Certificate of Service have been served. Please place this document of file.

Very Truly Yours,



Michael L. Kurtz, Esq.

Kurt J. Boehm, Esq.

Jody Kyler Cohn, Esq.

BOEHM, KURTZ & LOWRY

MLKkew
Attachment

cc: Certificate of Service
Quang Nyugen, Esq.
Richard Raff, Esq.

CERTIFICATE OF SERVICE

This is to certify that the foregoing copy of the foregoing is a true and accurate copy of the documents being filed in paper medium; that the electronic filing was transmitted to the Commission on August 29, 2017; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that a copy of the filing in paper medium is being overnighted to the Commission on August 29, 2017.



Michael L. Kurtz, Esq.

Kurt J. Boehm, Esq.

Jody Kyler Cohn, Esq.

William H May, III
Hurt, Deckard & May
The Equus Building
127 West Main Street
Lexington, KENTUCKY 40507

Don C Parker
Spilman Thomas & Battle, PLLC
300 Kanawha Blvd, East
Charleston, WEST VIRGINIA 25301

Elizabeth Sekula
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Post Office Box 16631
Columbus, OHIO 43216

Gregory T Dutton
Goldberg Simpson LLC
9301 Dayflower Street
Louisville, KENTUCKY 40059

Hector Garcia
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Post Office Box 16631
Columbus, OHIO 43216

James W Gardner
Sturgill, Turner, Barker & Moloney, PLLC
333 West Vine Street
Suite 1400
Lexington, KENTUCKY 40507

Janice Theriot
Zielke Law Firm PLLC
1250 Meidinger Tower
462 South Fourth Avenue
Louisville, KENTUCKY 40202

Justin M. McNeil
Office of the Attorney General Office of Rate
700 Capitol Avenue, Suite 20
Frankfort, KENTUCKY 40601-8204

Kent Chandler
Assistant Attorney General
Office of the Attorney General Office of Rate
700 Capitol Avenue, Suite 20
Frankfort, KENTUCKY 40601-8204

Kenneth J Gish, Jr.
Stites & Harbison
250 West Main Street, Suite 2300
Lexington, KENTUCKY 40507

Katie M Glass
Stites & Harbison
421 West Main Street
P. O. Box 634
Frankfort, KENTUCKY 40602-0634

Larry Cook
Assistant Attorney General
Office of the Attorney General Office of Rate
700 Capitol Avenue, Suite 20
Frankfort, KENTUCKY 40601-8204

Laurence J Zielke
Zielke Law Firm PLLC
1250 Meidinger Tower
462 South Fourth Avenue
Louisville, KENTUCKY 40202

Mark E Heath
Spilman Thomas & Battle, PLLC
300 Kanawha Blvd, East
Charleston, WEST VIRGINIA 25301

Honorable Matthew R Malone
Hurt, Deckard & May
The Equus Building
127 West Main Street
Lexington, KENTUCKY 40507

Honorable Mark R Overstreet
Stites & Harbison
421 West Main Street
P. O. Box 634
Frankfort, KENTUCKY 40602-0634

Morgain Sprague
Kentucky League of Cities
101 East Vine Street, Suite 800
Lexington, KENTUCKY 40507

Rebecca W Goodman
Assistant Attorney General
Office of the Attorney General Office of Rate
700 Capitol Avenue, Suite 20
Frankfort, KENTUCKY 40601-8204

Ranie Wohnhas
Managing Director
Kentucky Power Company
855 Central Avenue Suite 200
Ashland, KENTUCKY 41101